

SULLIVAN, HILL, REZ & ENGEL
A Professional Law Corporation
James P. Hill, CA SBN 90478 (Pro Hac Vice)
Jonathan S. Dabbieri, CA SBN 91963 (Pro Hac Vice)
Elizabeth E. Stephens, NV SBN 5788
228 South Fourth Street, First Floor
Las Vegas, NV 89101
Telephone: (702) 382-6440
Fax Number: (702) 384-9102

Attorneys for Chapter 7 Trustee,
William A. Leonard, Jr.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re)	CASE NO. BK-S-09-32824-RCJ (Lead Case)
)	
ASSET RESOLUTION, LLC,)	Jointly Administered with Case Nos.:
)	BK-S-09-32831-RCJ; BK-S-09-32839-RCJ;
)	BK-S-09-32843-RCJ; BK-S-09-32844-RCJ;
Debtor.)	BK-S-09-32846-RCJ; BK-S-09-32849-RCJ;
)	BK-S-09-32851-RCJ; BK-S-09-32853-RCJ;
)	BK-S-09-32868-RCJ; BK-S-09-32873-RCJ;
)	BK-S-09-32875-RCJ; BK-S-09-32878-RCJ;
)	BK-S-09-32880-RCJ; BK-S-09-32882-RCJ
)	
)	Chapter 7

Affects:

- ☐ All Debtors
- ☒ Asset Resolution, LLC, 09-32824
- ☐ Bundy 2.5 Million SPE, LLC, 09-32831
- ☐ Bundy Five Million SPE, LLC, 09-32839
- ☐ CFP Anchor B SPE, LLC, 09-32843
- ☐ CFP Cornman Toltec SPE, LLC, 09-32844
- ☐ CFP Gess SPE LLC, 09-32846
- ☐ CFP Gramercy SPE, LLC, 09-32849
- ☐ Fiesta Stoneridge, LLC, 09-32851
- ☐ Fox Hills SPE, LLC, 09-32853
- ☐ HFAH Monaco SPE, LLC, 09-32868
- ☐ Huntsville SPE, LLC, 09-32873
- ☐ Lake Helen Partners SPE, LLC, 09-32875
- ☐ Ocean Atlantic SPE, LLC, 09-32878
- ☐ Shamrock SPE, LLC, 09-32880
- ☐ 10-90 SPE, LLC, 09-32882

**REPLY DECLARATION OF JONATHAN
S. DABBIERI IN SUPPORT OF
OBJECTION TO CLAIMS 13-1 AND 13-2
OF THE INTERNAL REVENUE
SERVICE**

Date: February 22, 2021
Time: 10:00 a.m.
Judge: Hon. Robert C. Jones

1 I, Jonathan S. Dabbieri, declare:

2 1. I am over the age of majority and competent to testify as to all matters set forth herein, which
3 are true and correct and of my own personal knowledge. If called as a witness I could competently
4 testify as set forth herein.

5 2. Subsequent to the filing of her declaration in support of the trustee's objection to the IRS'
6 proof of claim, Ms. Chiang located in the debtor's records an amended 2008 tax return which had
7 been prepared, prepetition, by Asset Resolution's accountants. The amended return reflected that no
8 tax was due for 2008, however it is unclear if the amended return was filed with the IRS.

9 3. After their review (in the non-technical sense) of the 2008 return and based upon it and their
10 review of the debtor's books and records, the estate's accountants prepared and filed an amended
11 return. That return is currently being processed by the IRS. A copy of the filed amended return is
12 attached as Exhibit 1.

13 I declare under penalty of perjury under the laws of the United States of America the
14 foregoing is true and correct and of my own personal knowledge. Executed this 16th day of
15 February, 2021 at Marina del Rey, California.

16
17 /s/ Jonathan S. Dabbieri

Jonathan S. Dabbieri

EXHIBIT “1”

Asset Resolution, LLC Bankruptcy Estate
Amended Forms 8804 and 8805
Annual Returns for Withholding Tax and
Foreign Partner Withholding
Period Ended December 31, 2008
(Trustee's Copy)

Request for Prompt Determination
William A. Leonard, Jr., Bankruptcy Trustee
Asset Resolution, LLC Bankruptcy Estate
6625 S. Valley View Blvd., Bldg. B, Ste 224
Las Vegas, NV 89118

Internal Revenue Service
Centralized Insolvency Operation
P.O. Box 7346
Philadelphia, PA 19101-7346

RE: Asset Resolution, LLC Bankruptcy Estate
Chapter 7 Bankruptcy Case No.: BK-S-09-32824-RCJ (Lead Case)
U.S.B.C. – District of Nevada
FEIN:
Amended Forms 8804 and 8805 for the Period Ended December 31, 2008

Gentlepersons:

The undersigned is the duly appointed, qualified and acting Trustee of the above-captioned bankrupt limited liability company ("LLC").

Enclosed is a duplicate original 2008 Amended Annual Return for Partnership Withholding Tax and Corrected Foreign Partner's Information Statement of Section 1446 Withholding Tax ("Return") in connection with the administration of the above-captioned bankrupt entity for the period ended December 31, 2008. The original Return has been filed concurrently with this application with the Internal Revenue Service in Ogden, Utah. I, William A. Leonard, Jr., as Trustee of this bankrupt entity, under penalty of perjury, declare that to the best of my knowledge all information on the return is true, correct and complete.

Pursuant to provisions in 26 U.S.C. §6501(d), 11 U.S.C. Section 505(b), Reg. §301.6501(d)-1(b), Rev. Proc. 2006-24, Publication 908, and corresponding state law, I request a prompt determination by you of (1) any unpaid liability of the bankrupt entity for any tax incurred during the administration of the case and (2) any required adjustments to the Return. I place you on notice that unless you notify me within sixty days after this request that such return has been selected for examination, the Debtor and I will be discharged from any liability for such tax.

If you do select the return for examination and notify me within the sixty day period, then pursuant to the provisions of Section 505(b)(1)(B), you are required to complete such examination and notify me of any tax due within 180 days after this request, or within such additional time as the Bankruptcy Court for the above-captioned case permits.

Thank you for your cooperation.

Very truly yours,

William A. Leonard, Jr.
(Not individually, but solely as) Trustee

Date

AMENDED

Form 8804	Annual Return for Partnership Withholding Tax (Section 1446) ▶ See separate Instructions for Forms 8804, 8805, and 8813. ▶ Attach Form(s) 8805.	OMB No. 1545-1119
Department of the Treasury Internal Revenue Service	For calendar year 2008 or tax year beginning , 2008, and ending , 20	2008
Check this box if the partnership keeps its records and books of account outside the United States and Puerto Rico . . . ▶ <input type="checkbox"/>		

Part I Partnership

1a Name of partnership ASSET RESOLUTION, LLC	b U.S. employer identification number 26 :										
c Number, street, and room or suite no. If a P.O. box, see instructions. C/O BANKRUPTCY TRUSTEE, 6625 S VALLEY VIEW BLVD, BLDG 13, STE 224	For IRS Use Only										
	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CC</td> <td style="width: 50%;">FD</td> </tr> <tr> <td>RD</td> <td>FF</td> </tr> <tr> <td>CAF</td> <td>FP</td> </tr> <tr> <td>CR</td> <td>I</td> </tr> <tr> <td>EDC</td> <td></td> </tr> </table>	CC	FD	RD	FF	CAF	FP	CR	I	EDC	
CC	FD										
RD	FF										
CAF	FP										
CR	I										
EDC											
d City, state, and ZIP code. If a foreign address, see instructions. LAS VEGAS, NV 89118											

Part II Withholding Agent

2a Name of withholding agent. If partnership is also the withholding agent, enter "SAME" and do not complete lines 2b-d. SAME	b Withholding agent's U.S. employer identification number
c Number, street, and room or suite no. If a P.O. box, see instructions.	
d City, state, and ZIP code	

Part III Section 1446 Tax Liability and Payments

3 Enter number of foreign partners. ▶				
4 Total effectively connected taxable income allocable to foreign partners (see instructions):				
a Net ordinary income and net short-term capital gain	4a	NONE		
b Reduction to line 4a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4b	()		
c Reduction to line 4a for valid partner certificates under Regulations section 1.1446-6	4c	()		
d Combine lines 4a, 4b, and 4c			4d	NONE
e 28% rate gains allocable to non-corporate partners	4e			
f Reduction to line 4e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4f	()		
g Reduction to line 4e for valid partner certificates under Regulations section 1.1446-6	4g	()		
h Combine lines 4e, 4f, and 4g			4h	
i Unrecaptured section 1250 gains allocable to non-corporate partners	4i			
j Reduction to line 4i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4j	()		
k Reduction to line 4i for valid partner certificates under Regulations section 1.1446-6	4k	()		
l Combine lines 4i, 4j, and 4k			4l	
m Qualified dividend income and net long-term capital gains (including net section 1231 gains) allocable to non-corporate partners	4m			
n Reduction to line 4m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4n	()		
o Reduction to line 4m for valid partner certificates under Regulations section 1.1446-6	4o	()		
p Combine lines 4m, 4n, and 4o			4p	

Form 8804 (2008)

Page **2**

5 Gross section 1446 tax liability:					
a	Multiply line 4d by 35% (.35)	5a	NONE		
b	Multiply line 4h by 28% (.28)	5b			
c	Multiply line 4l by 25% (.25)	5c			
d	Multiply line 4p by 15% (.15)	5d			
e	Add lines 5a through 5d	5e		NONE	
6a Payments of section 1446 tax made by the partnership identified on line 1a during its tax year (or with a request for an extension of time to file) and amount credited from 2007 Form 8804		6a			
b Section 1446 tax paid or withheld by another partnership in which the partnership identified on line 1a was a partner during the tax year (attach Form(s) 1042-S or 8805).		6b			
c Section 1445(a) or 1445(e)(1) tax withheld from or paid by the partnership identified on line 1a during the tax year for a disposition of a U.S. real property interest. Attach Form(s) 1042-S or 8288-A. See the instructions		6c			
7 Total payments. Add lines 6a through 6c.		7			
8 Estimated tax penalty (see instructions). Check if Schedule A (Form 8804) is attached <input type="checkbox"/>		8			
9 Add lines 5e and 8		9		NONE	
10 Balance due. If line 7 is smaller than line 9, enter balance due. Attach a check or money order for the full amount payable to the "United States Treasury." Write the partnership's U.S. employer identification number, tax year, and Form 8804 on it		10		NONE	
11 Overpayment. If line 7 is more than line 9, enter amount overpaid		11			
12 Amount of line 11 you want refunded to you		12			
13 Amount of line 11 you want credited to next year's Form 8804		13			

Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than general partner, limited liability company member, or withholding agent) is based on all information of which preparer has any knowledge.

Signature of general partner, limited liability company member, or withholding agent: Not individually, but solely, as TRUSTEE Title: _____ Date: _____

Paid Preparer's Use Only

Preparer's signature: Eileen Castillo Date: 11/23/20 Check if self-employed ☐ Preparer's SSN or PTIN: _____
 Firm's name (or yours if self-employed): BAKER TILLY US, LLP EIN: 39
 address, and ZIP code: 3655 NOBEL DRIVE, STE 300, SAN DIEGO, CA 92122 Phone no.: (858) 597-4100

Form **8804** (2008)

Form **8275**

(Rev. August 2013)

Department of the Treasury
Internal Revenue Service**Disclosure Statement**

Do not use this form to disclose items or positions that are contrary to Treasury regulations. Instead, use Form 8275-R, Regulation Disclosure Statement.

► Information about Form 8275 and its separate instructions is at www.irs.gov/form8275.

► Attach to your tax return.

OMB No. 1545-0889

Attachment
Sequence No. **92**

Name(s) shown on return

Identifying number shown on return

ASSET RESOLUTION, LLC

If Form 8275 relates to an information return for a foreign entity (for example, Form 5471), enter:

Name of foreign entity ►

Employer identification number, if any ►

Reference ID number (see instructions) ►

Part I General Information (see instructions)

(a) Rev. Rul., Rev. Proc., etc.	(b) Item or Group of Items	(c) Detailed Description of Items	(d) Form or Schedule	(e) Line No.	(f) Amount
1		SEE DISCLOSURE STATEMENT A			
2					
3					
4					
5					
6					

Part II Detailed Explanation (see instructions)

1	
2	
3	
4	
5	
6	

Part III Information About Pass-Through Entity. To be completed by partners, shareholders, beneficiaries, or residual interest holders.

Complete this part only if you are making adequate disclosure for a pass-through item.

Note: A pass-through entity is a partnership, S corporation, estate, trust, regulated investment company (RIC), real estate investment trust (REIT), or real estate mortgage investment conduit (REMIC).

1 Name, address, and ZIP code of pass-through entity	2 Identifying number of pass-through entity
	3 Tax year of pass-through entity / / to / /
	4 Internal Revenue Service Center where the pass-through entity filed its return

In re: Asset Resolution, LLC and related cases
U.S.B.C. Case No.: BK-S-09-32824-RCJ (Lead Case)
Federal ID#:
For the Period Ended December 31, 2008
Disclosure Statement A

Asset Resolution, LLC aka Asset Resolution Company ("Debtor") and its affiliates Bundy Five Million LLC, Bundy 2.5 Million SPE LLC, CFP Anchor B SPE LLC, CFP Gramercy SPE LLC, Fiesta Stoneridge LLC, Fox Hills SPE LLC, HFAH Monaco SPE LLC, Huntsville SPE LLC, Lake Helen Partners SPE LLC, Ocean Atlantic SPE, LLC, Shamrock SPE LLC, CFP Gess SPE LLC, CFP Cornman Toltec SPE LLC, and 10-90 SPE LLC (collectively, "Debtors") filed for relief under chapter 11 of the United States Bankruptcy Code on or around October 14, 2009 in the United States Bankruptcy Court for the Southern District of New York.

On November 24, 2009, the United States Bankruptcy Court for the Southern District of New York entered its order transferring the venue of these cases from said court to the United States Bankruptcy Court for the District of Nevada. The court subsequently entered an order withdrawing the reference of these cases, and as a result these cases and related proceedings are now venued in the United States District Court for the District of Nevada. These fifteen (15) cases are jointly administered. On or about January 29, 2010, the court entered its nunc pro tunc order converting the chapter 11 cases to cases under chapter 7, effective January 19, 2010. William A. Leonard, Jr. ("Trustee") was subsequently appointed as the chapter 7 trustee of the Debtors' jointly administered bankruptcy estates.

These jointly administered cases arise out of the separate bankruptcy proceedings of USA Commercial Mortgage Company ("USACM") and its related entities. On or about April 13, 2006, USACM filed a chapter 11 bankruptcy petition in the United States Bankruptcy Court for the District of Nevada. The USACM bankruptcy court authorized a sale of USACM's assets, which were sold at auction to the successful bidder, Compass Financial Partners, LLC ("Compass"). Compass' acquisition was funded by Silar Advisors, LP ("Silar") through a master repurchase agreement. Compass ultimately defaulted on its obligations to Silar, and on or about September 26, 2008, Silar "foreclosed" on the assets and formed the Debtor to acquire and service these assets.

In 2008, the Debtor was organized in Delaware as an LLC. At various times prior to the bankruptcy filing, the Debtor or its predecessors organized affiliated single member LLCs (see affiliates listed above as Debtors) as special purpose entities to hold specific assets. The Debtor was almost immediately plunged into continuing litigation as a result of its acquisition of USACM assets, with disputes arising around ownership rights and obligations, etc., resulting in the Debtors' inability to operate efficiently and ultimately led to the bankruptcy filings of the Debtors.

In re: Asset Resolution, LLC and related cases
U.S.B.C. Case No.: BK-S-09-32824-RCJ (Lead Case)
Federal ID#:
For the Period Ended December 31, 2008
Disclosure Statement A

The Trustee wishes to disclose the following information and limitations involved in the filing of the Debtor's AMENDED Forms 8804 and 8805 for the period ended December 31, 2008:

- The Debtor provided records and other information to the Trustee and his professionals including copies of its 2008 originally filed and amended tax returns and related Forms 8804 and 8805. The Trustee has not verified and cannot provide any assurances as to the validity or accuracy of the information carried forward to or previously reported on Forms 8804 and 8805 prepared by the Debtor, its representatives or predecessors.
- The 2008 federal tax returns provided to the Trustee by the Debtor were the initial returns of the Debtor and reported transactions for a prepetition/pre-trustee period. These 2008 tax returns, along with Forms 8804 and 8805, were almost immediately amended by the Debtor to reflect a significant net operating loss for its initial 2008 tax period. It appears the filed AMENDED Forms 8804 and 8805 were never recorded as AMENDED, but instead recorded as duplicate filings by the Internal Revenue Service.
- The AMENDED Forms 8804 and 8805 filed herein reflect the amended reporting of the Debtor for 2008 based upon the Debtor's own records and determinations and are submitted as such. The Trustee has requested these forms be prepared and re-filed in order to correct the Debtor's tax record.
- Pursuant to provisions in 26 U.S.C. §6501(d), 11 U.S.C. Section 505(b), Reg. §301.6501(d)-1(b), Rev. Proc. 2006-24, Publication 908, and corresponding state law, the Trustee is concurrently filing these Forms with prompt determination requests to the bankruptcy/insolvency division of the Internal Revenue Service.

These forms have been prepared based upon the best information available at this time and has been prepared based on the Trustee's reasonable good faith efforts under the circumstances. However, the Trustee can provide no assurance as to the completeness or accuracy of the information relied upon in the preparation of these Forms, other than that obtained from the Trustee's own records. If the Trustee receives additional and/or more accurate information, amended forms will be prepared, if appropriate.

CORRECTED

Form 8805	Foreign Partner's Information Statement of Section 1446 Withholding Tax ▶ See separate instructions for Forms 8804, 8805, and 8813.		OMB No. 1545-1119 2008 Copy A for Internal Revenue Service Attach to Form 8804.
Department of the Treasury Internal Revenue Service			
For partnership's calendar year 2008, or tax year beginning , 2008, and ending , 20			
1a Foreign partner's name GOTTEX C/O SILAR	b U.S. identifying number FOREIGN US	5a Name of partnership ASSET RESOLUTION LLC	b U.S. EIN
c Address (if a foreign address, see instructions) 333 SEVENTH AVENUE, 3RD FLOOR NEW YORK, NY 10001		c Address (if a foreign address, see instructions) C/O BANKRUPTCY TRUSTEE 6625 S VALLEY VIEW BLVD, BLDG B, STE 224 LA VEGAS, NV 89118	
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7. SAME	
3 Type of partner (specify—see instructions) ▶ INDIVIDUAL		7 Withholding agent's U.S. employer identification number	
4 Country code of partner. See the instructions for a listing of codes ▶			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>			
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>			
9 Partnership's ECTI allocable to partner for the tax year (see instructions)		9	NONE
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.		10	NONE
Schedule T—Beneficiary Information (see instructions)			
11a Name of beneficiary		c Address (if a foreign address, see instructions)	
b U.S. identifying number of beneficiary			
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)		12	
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)		13	
For Paperwork Reduction Act Notice, see separate instructions for Forms 8804, 8805, and 8813.			
		Cat. No. 10078E	Form 8805 (2008)

CORRECTED

Form 8805		Foreign Partner's Information Statement of Section 1446 Withholding Tax		OMB No. 1545-1119 2008	
Department of the Treasury Internal Revenue Service		▶ See separate Instructions for Forms 8804, 8805, and 8813.		Copy B for partner Keep for your records.	
For partnership's calendar year 2008, or tax year beginning , 2008, and ending , 20					
1a Foreign partner's name		b U.S. identifying number		5a Name of partnership	
GOTTEX C/O SILAR		FOREIGN US		ASSET RESOLUTION LLC	
c Address (if a foreign address, see instructions)		c Address (if a foreign address, see instructions)		b U.S. EIN	
333 SEVENTH AVENUE, 3RD FLOOR NEW YORK, NY 10001		C/O BANKRUPTCY TRUSTEE 6625 S VALLEY VIEW BLVD, BLDG B, STE 224 LA VEGAS, NV 89118			
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7.			
3 Type of partner (specify—see instructions) ▶ INDIVIDUAL		SAME			
4 Country code of partner. See the instructions for a listing of codes ▶		7 Withholding agent's U.S. employer identification number			
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>					
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>					
9 Partnership's ECTI allocable to partner for the tax year (see instructions)				9	NONE
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.				10	NONE
Schedule T—Beneficiary Information (see instructions)					
11a Name of beneficiary		c Address (if a foreign address, see instructions)			
b U.S. identifying number of beneficiary					
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)				12	
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)				13	

Form **8805** (2008)

CORRECTED

Form 8805 Department of the Treasury Internal Revenue Service		Foreign Partner's Information Statement of Section 1446 Withholding Tax ▶ See separate Instructions for Forms 8804, 8805, and 8813. For partnership's calendar year 2008, or tax year beginning , 2008, and ending , 20		OMB No. 1545-1119 2008 Copy C for partner Attach to your Federal tax return.	
1a Foreign partner's name GOTTEX C/O SILAR		b U.S. identifying number FOREIGN US		5a Name of partnership ASSET RESOLUTION LLC	
c Address (if a foreign address, see instructions) 333 SEVENTH AVENUE, 3RD FLOOR NEW YORK, NY 10001				c Address (if a foreign address, see instructions) C/O BANKRUPTCY TRUSTEE 6625 S VALLEY VIEW BLVD, BLDG B, STE 224 LA VEGAS, NV 89118	
2 Account number assigned by partnership (if any)				6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7. SAME	
3 Type of partner (specify—see instructions) ▶ INDIVIDUAL				7 Withholding agent's U.S. employer identification number	
4 Country code of partner. See the instructions for a listing of codes ▶					
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>					
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>					
9 Partnership's ECTI allocable to partner for the tax year (see instructions)				9	NONE
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.				10	NONE
Schedule T—Beneficiary Information (see instructions)					
11a Name of beneficiary		c Address (if a foreign address, see instructions)			
b U.S. identifying number of beneficiary					
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)				12	
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)				13	

Form **8805** (2008)

CORRECTED

Form	8805	Foreign Partner's Information Statement of Section 1446 Withholding Tax ▶ See separate Instructions for Forms 8804, 8805, and 8813.		OMB No. 1545-1119	2008
Department of the Treasury Internal Revenue Service		For partnership's calendar year 2008, or tax year beginning , 2008, and ending , 20		Copy D for Withholding Agent.	
1a Foreign partner's name GOTTEX C/O SILAR		b U.S. identifying number FOREIGN US		5a Name of partnership ASSET RESOLUTION LLC	
c Address (if a foreign address, see instructions) 333 SEVENTH AVENUE, 3RD FLOOR NEW YORK, NY 10001		c Address (if a foreign address, see instructions) C/O BANKRUPTCY TRUSTEE 6625 S VALLEY VIEW BLVD, BLDG B, STE 224 LA VEGAS, NV 89118			
2 Account number assigned by partnership (if any)		6 Withholding agent's name. If partnership is also the withholding agent, enter "SAME" and do not complete line 7. SAME			
3 Type of partner (specify—see instructions) ▶ INDIVIDUAL		7 Withholding agent's U.S. employer identification number			
4 Country code of partner. See the instructions for a listing of codes ▶					
8a Check if the partnership identified on line 5a owns an interest in one or more partnerships <input type="checkbox"/>					
b Check if any of the partnership's effectively connected taxable income (ECTI) is exempt from U.S. tax for the partner identified on line 1a <input type="checkbox"/>					
9 Partnership's ECTI allocable to partner for the tax year (see instructions)				9	NONE
10 Total tax credit allowed to partner under section 1446 (see instructions). Individual and corporate partners: Claim this amount as a credit against your U.S. income tax on Form 1040NR, 1120-F, etc.				10	NONE
Schedule T—Beneficiary Information (see instructions)					
11a Name of beneficiary		c Address (if a foreign address, see instructions)			
b U.S. identifying number of beneficiary					
12 Amount of ECTI on line 9 to be included in the beneficiary's gross income (see instructions)				12	
13 Amount of tax credit on line 10 that the beneficiary is entitled to claim on its return (see instructions)				13	

Form **8805** (2008)

AMENDED

Form 8804 Department of the Treasury Internal Revenue Service	Annual Return for Partnership Withholding Tax (Section 1446)	OMB No. 1545-1119
	<p>▶ See separate Instructions for Forms 8804, 8805, and 8813.</p> <p>▶ Attach Form(s) 8805.</p> <p>For calendar year 2008 or tax year beginning , 2008, and ending , 20</p>	2008

Check this box if the partnership keeps its records and books of account outside the United States and Puerto Rico. ☐**Part I Partnership**

1a Name of partnership ASSET RESOLUTION, LLC	b U.S. employer identification number 26										
c Number, street, and room or suite no. If a P.O. box, see instructions. C/O BANKRUPTCY TRUSTEE, 6625 S VALLEY VIEW BLVD, BLDG B, STE 224	For IRS Use Only										
d City, state, and ZIP code. If a foreign address, see instructions. LAS VEGAS, NV 89118	<table border="1"> <tr> <td>CC</td> <td>FD</td> </tr> <tr> <td>RD</td> <td>FF</td> </tr> <tr> <td>CAF</td> <td>FP</td> </tr> <tr> <td>CR</td> <td>I</td> </tr> <tr> <td>EDC</td> <td></td> </tr> </table>	CC	FD	RD	FF	CAF	FP	CR	I	EDC	
CC	FD										
RD	FF										
CAF	FP										
CR	I										
EDC											

Part II Withholding Agent

2a Name of withholding agent. If partnership is also the withholding agent, enter "SAME" and do not complete lines 2b-d. SAME	b Withholding agent's U.S. employer identification number
c Number, street, and room or suite no. If a P.O. box, see instructions.	
d City, state, and ZIP code	

Part III Section 1446 Tax Liability and Payments

3 Enter number of foreign partners.		
4 Total effectively connected taxable income allocable to foreign partners (see instructions):		
a Net ordinary income and net short-term capital gain	4a	NONE
b Reduction to line 4a for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4b	()
c Reduction to line 4a for valid partner certificates under Regulations section 1.1446-6	4c	()
d Combine lines 4a, 4b, and 4c	4d	NONE
e 28% rate gains allocable to non-corporate partners	4e	
f Reduction to line 4e for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4f	()
g Reduction to line 4e for valid partner certificates under Regulations section 1.1446-6	4g	()
h Combine lines 4e, 4f, and 4g	4h	
i Unrecaptured section 1250 gains allocable to non-corporate partners	4i	
j Reduction to line 4i for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4j	()
k Reduction to line 4i for valid partner certificates under Regulations section 1.1446-6	4k	()
l Combine lines 4i, 4j, and 4k	4l	
m Qualified dividend income and net long-term capital gains (including net section 1231 gains) allocable to non-corporate partners	4m	
n Reduction to line 4m for state and local taxes under Regulations section 1.1446-6(c)(1)(iii)	4n	()
o Reduction to line 4m for valid partner certificates under Regulations section 1.1446-6	4o	()
p Combine lines 4m, 4n, and 4o	4p	